

EXHIBIT B

Michael T. Edens
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1 Q Okay. Did you go into the side door of the house?

2 A The one adjacent to the driveway?

3 Q Yes.

4 A Yes.

5 Q And when you went in the side door of the house what type of
6 area did you step into?

7 A It would have been a hallway leading downstairs to the
8 basement with steps leading up to the kitchen.

9 Q Okay. Was it a hallway or like a mudroom? I guess a
10 hallway gives me the impression it was real long and big.
11 If you can give me an estimate of the size.

12 A If I recall right, when you walk in it's like 3 1/2 feet,
13 roughly, with stairs leading downwards, and then off to my
14 left there was stairs going to the kitchen. There was like
15 a place where you -- I guess if you want to call it a
16 mudroom where you put your shoes.

17 Q Like 3 1/2 feet square, it sounds like?

18 A Yeah.

19 Q Okay. Stairs that went downstairs, stairs that go up to the
20 kitchen?

21 A Yes.

22 Q And how many stairs went up to the kitchen about?

23 A Four or five, I think.

24 Q Okay. And when you got into this mudroom I want to know who
25 you saw and where they were at in relationship to you.

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1 did anybody else say anything?

2 A Not that I recall. I mean -- I don't know.

3 Q Okay. So he comes in and does he ask to see his daughter in
4 like a normal, "Hey, can I see my daughter?"

5 A I believe so.

6 Q Okay. Nothing threatening to you, was it?

7 A Not -- no.

8 Q Okay. And so he asks to see his daughter. You don't
9 remember anybody saying anything. So with that I have to
10 ask the question did you tell him to get out of the house?
11 Did you tell him if you could pat him down?

12 A At that point he came in, asked to see his daughter. I
13 remember after that the next thing I know him and Mr.
14 Collins -- right? Correct?

15 Q Yes.

16 A -- were engaged in a verbal argument.

17 Q Okay. So let's try to dissect it, because I find sometimes
18 when we dissect it, it helps jog your memory.

19 A Uh-huh.

20 Q So you're right at the door when he comes in. Does he cross
21 the threshold of that door when he says, "Can I see my
22 daughter," or does he say it kind of still on the outside?

23 A I can't recall.

24 Q Okay. Fair enough. Did anybody -- did any officer respond
25 to his question? No, you can't; yes, you can; get out of

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1 Q Okay. What happened next?

2 A At that point Mr. Pollard then, to my recollection,
3 pushed -- tried to release -- yeah, pushed Officer DeKuiper
4 out of the way in an attempt to go after Mr. Collins.

5 Q Now so at some point you allowed Mr. Pollard to get in front
6 of you?

7 A Yes.

8 Q Did you tell him to ever get behind you or get back?

9 A Once he started yelling I told him to stop and to leave.

10 Q Okay.

11 A Along those words. I don't know exactly what I said.

12 Q But when he moved past you, you didn't try to stop him
13 initially, did you?

14 A No.

15 Q Okay.

16 A It was more of the fact of I was standing in the door, he
17 came up, I kind of stepped out of his way so he could kind
18 of enter the house a little bit. So I was basically
19 standing more I guess you want to say closer to the
20 downstairs part and then he was there.

21 Q Sure.

22 A Like, I don't know, in the corner with me and behind him or
23 next to him would have been the stairs.

24 Q Okay. And even with all of that you never even went for
25 your weapon, did you?

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1 A No.

2 Q Okay. And then you said he pushed DeKuiper?

3 A Yes, if I recall right.

4 Q So how does that happen? Like do you -- first of all, let's
5 take it step-by-step. Is DeKuiper on the step or is he
6 still on the mudroom floor?

7 A I was on the floor. Officer DeKuiper was on the step. I
8 don't know which step. I just know he was on the stairs.

9 Q And Ratliff was on a step above him?

10 A Yes.

11 Q All right. And so how does he push DeKuiper? Like with his
12 hands, or does he like -- is he trying to go up the stairs
13 and he brushes him with his shoulder?

14 A To me it looked like he was trying to like get him out of
15 the way. Like push him up against the wall.

16 Q Okay. So you're motioning with your hands --

17 A Yes.

18 Q -- as if to suggest --

19 A I don't know how to describe it.

20 Q Right. And I'm going to help you, because she can't take
21 down the motions.

22 A Right. I know we don't have a camera in here.

23 Q So according to your description -- your attorney will
24 correct me if I'm wrong -- your belief is that Mr. Pollard
25 was taking his hands in a sweeping/pushing motion as if to

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1 A I can't recall.

2 Q Okay. What about Ratliff? What did he -- did he escort,
3 too?

4 A Yeah, he assisted. And then by the time Mr. Pollard -- we
5 got Pollard outside.

6 Q Okay. Hold on. So Ratliff and DeKuiper physically get
7 Pollard out of the mudroom to outside; is that correct?

8 A If I recall right, it was mainly Officer DeKuiper first.

9 Q Okay. Did Ratliff have hands on Pollard at that point?

10 A I want to -- my recollection is right when he got outside he
11 helped Officer DeKuiper put him in cuffs.

12 Q Okay. Well, let's go step-by-step. Once -- so it sounds
13 like DeKuiper and Pollard would be the first two people out
14 of the mudroom? Outside? Is that --

15 A I believe so.

16 Q Okay. Followed quickly by Ratliff and then you? Is that
17 the sequence?

18 A I would say -- I would like to say yes but, again, I can't
19 remember if I was already outside or I stepped aside in the
20 mudroom.

21 Q Okay. Once DeKuiper and Pollard are outside what
22 immediately happens once their feet touch the outside of
23 that mudroom? Do they go somewhere or does something --

24 A They stayed right outside the door.

25 Q And when you say "stayed right outside the door" are you

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1 meaning within arm's reach? They could touch that door?

2 A I wouldn't say within arm's reach, but probably within a
3 good proximity. 5 feet or so.

4 Q And you don't remember if there was a vehicle in the
5 driveway?

6 A Not that I recall.

7 Q Okay. What happens in the driveway? Because that's where
8 you go once you exit that side door, right?

9 A Yes.

10 Q You're in a driveway. Okay. So within seconds it sounds
11 like you, Ratliff, and DeKuiper are outside in that
12 driveway?

13 A Yes.

14 Q Okay. Does anybody else come out in the minute or two
15 after, or is it the three of you?

16 A At that time it's just the four of us if you want to include
17 Mr. Pollard.

18 Q Oh, Mr. Pollard. All right. What happens next?

19 A Officer DeKuiper and Officer Ratliff were able to detain Mr.
20 Pollard in handcuffs.

21 Q Okay. Do you assist in that?

22 A No.

23 Q Okay. If you would have seen Mr. Pollard being a threat to
24 your partners or doing anything that you thought that would
25 injure them you would certainly intervene on their behalf,

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1 wouldn't you?

2 A Yes.

3 Q You didn't see any of that, did you?

4 A No.

5 Q So DeKuiper and Ratliff are detaining Mr. Pollard. How does
6 that happen? What do you see?

7 A Them escorting him outside and, you know, telling him to put
8 his hands behind his back, and the next thing you know he
9 was cuffed. I mean, it wasn't -- it was a very short time.

10 Q Okay. So they take him outside. The three officers and
11 Pollard are in the driveway. They tell him to put his hands
12 behind his back. Does he comply?

13 A I would say yes at that point.

14 Q Okay. And do they put hands behind his back to cuff him?

15 A Yes.

16 Q Okay. You didn't see Mr. Pollard resist at that point, did
17 you, to be handcuffed?

18 A All I -- there was like a slight shuffle. I don't know if
19 it was because the hands are-- getting the hands behind the
20 back was a little tough. But other than that it was -- like
21 I said, it was real quick and the next thing you know he was
22 cuffed and that was the end of it.

23 Q None of your partners asked for assistance to cuff him, did
24 they?

25 A No. I -- just them two. They were handling it